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June 4, 2021

**Via ECF**

The Honorable District Judge John G. Koeltl  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED

  
\_\_\_\_\_  
John G. Koeltl, U.S.D.J.

6/7/21

Re: **Santos et al v. West 4<sup>th</sup> Street Rest. Corp**  
**Docket No.: 20-cv-1664 (JGK)**

Dear Judge Koeltl:

Our office represents the Plaintiffs in the above-referenced matter and we submit this letter motion to respectfully request an extension of time to file the parties' settlement submission, including the settlement agreement and explanation of fairness. Pursuant to the Court's May 25, 2021 Order, the settlement submission is due to the Court today, June 4, 2021. We respectfully request that the time to file be extended to June 15, 2021.

Our office makes the instant request as we are still in the process of finalizing the necessary documents for the Court's review following both parties' acceptance of the mediator's settlement proposal on May 20, 2021. This is the first request for an extension of time to file the settlement submission and Defendants' counsel consents to this request. This request will not affect any other scheduled dates or deadlines.

We thank the Court for its consideration and remain available to provide any additional information.

Very truly yours,

/s/ \_\_\_\_\_  
Roman Avshalumov, Esq.

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